

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

BRIAN YOUNG, SANDY YOUNG,)	
TIMOTHY CORBETT, DAVID WELLS,)	
and STEVE RICHMOND,)	
)	
Plaintiffs,)	
)	
v.)	
)	Cause No. 3:12-cv-475 JVB-CAN
THE CITY OF SOUTH BEND Acting)	
through its Police Department, DARRYL)	
BOYKINS, Individually and in his Official)	
Capacity as Chief of Police, KAREN)	
DEPAEPE, and SCOTT DUERRING,)	
)	
Defendants.)	

MOTION FOR LEAVE TO FILE SECOND AMNEDED COMPLAINT

Plaintiffs, by counsel, request leave pursuant to Fed.R.Civ.P. 15(a) to file their Second Amended Complaint.

1. Plaintiffs filed their original Complaint for damages on October 12, 2012.
Plaintiffs subsequently amended their complaint to include declaratory and injunctive relief.
2. Since then, the parties have conducted extensive discovery that revealed other parties' factual allegations and established a more definitive record of the events complained of.
3. Plaintiffs wish to amend their Complaint to conform to the evidence presented.

4. A proposed Second Amended Complaint for Damages, Declaratory Judgment, and Permanent Injunction is attached as an exhibit to this Motion.

WHEREFORE, Plaintiffs pray that the Court will grant them leave to file their first Amended Complaint.

Respectfully submitted,

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One of Plaintiffs' Attorneys

CERTIFICATE OF SERVICE

I certify that the foregoing was filed on January 20, 2014 using the Court's CM/ECF system and is available to all counsel of record using the same.

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